



STATE OF ISRAEL
REQUEST FOR RETURN OF ABDUCTED CHILDREN
HAGUE CONVENTION OF 25 OCTOBER 1980 ON THE
CIVIL ASPECTS OF INTERNATIONAL CHILD ABDUCTION

FROM THE CENTRAL AUTHORITY FOR THE STATE OF ISRAEL
 TO THE CENTRAL AUTHORITY OF THE UNITED STATES OF
 AMERICA

1. Details of the children:

First Child

| | |
|-----------------------------------|--|
| First and last name(s) | Blima Felberbaum |
| Date of birth | May 1, 2014 |
| Place of birth | United States |
| Habitual residence before removal | Miriam Hanveaa 23, Beit Shemesh, Israel |
| Nationality | American |
| Passport number | Unknown |
| Additional nationality | Israeli |
| Additional passport number | ██████████ |
| Gender | Female |
| Physical description | Photo attached, see exhibit F |

Second Child

| | |
|-----------------------------------|--|
| First and last name(s) | Moshe Felberbaum |
| Date of birth | September 11, 2015 |
| Place of birth | United States |
| Habitual residence before removal | Miriam Hanveaa 23, Beit Shemesh, Israel |
| Nationality | American |
| Passport number | Unknown |
| Additional nationality | Israeli |
| Additional passport number | ██████████ |
| Gender | Male |
| Physical description | Photo attached, see exhibit F |

2. Details of the Parents:**Parent one**

| | |
|------------------------------|---|
| First and last name(s) | Perl Felberbaum |
| Date of birth | January 7, 1984 |
| Place of birth | Israel |
| Nationality | Israeli |
| Passport number | [REDACTED] |
| Additional nationality | American |
| Additional passport number | [REDACTED] |
| Relationship to the children | Mother |
| Occupation | Rhythmic dance instructor |
| Habitual residence | At the time of the wrongful retention the mother lived at Miriam Hanveaa 23, Beit Shemesh, Israel, but has since moved to Ezra 39, Bnei Brak, Israel. |
| Telephone number | +972-58-3279438 |
| Language(s) | Hebrew, minimum proficiency in English. Will require assistance with translation. |

Parent two

| | |
|------------------------------|--|
| First and last name(s) | Yaakov Felberbaum |
| Date of birth | January 18, 1984 |
| Place of birth | United States |
| Nationality | American |
| Passport number | [REDACTED] |
| Additional nationality | Israeli |
| Additional passport number | Unknown |
| Relationship to the children | Father |
| Occupation | Yeshiva student |
| Habitual residence | Miriam Hanveaa 23, Beit Shemesh, Israel |
| Telephone number | +1-8454500499 = appears to not be in use now |
| Language(s) | Hebrew and English |

| | |
|----------------------------|-------------------------------------|
| Date and Place of Marriage | November 2, 2011, Bnei Brak, Israel |
| Date and Place of Divorce | Still married |

3. Detail of the individual requesting the return of the children:**Requesting individual**

| | |
|-------------------------------|----------------------------|
| First and last name(s) | Perl Felberbaum |
| Nationality | Israeli |
| Relationship to the child/ren | Mother |
| Habitual residence | Ezra 39, Bnei Brak, Israel |
| Telephone and mobile number | +972-58-3279438 |

4. Details of legal advisor both in the requesting and requested country:

| | |
|---|--|
| Name, address and telephone number of legal adviser in requesting country | |
| Name, address and telephone number of legal adviser in requested country | The mother wishes to have an attorney appointed through the Legal Aid Program in the United States |

5. Details of the person alleged to have retained the children:

| | |
|--|--|
| First and last name(s) | Yaakov Felberbaum |
| Relationship to the children | Father |
| Last known address after the retention of the children | ROTH 306-181 UINT 304 MONSEY U.S.A |
| Last known phone number | +184-54500499 |
| Names and contact details of persons in the requested country who might be able to supply additional information relating to the whereabouts of the children, and the relation of such persons to the children | Landline number of the house where the children are: +184-53560062 Shimon Weinberg - the children's uncle. phone number: +184-55385656 Mendel Weinberg - the children's aunt. phone number: +184-55385636 The phone number of the boy's educational institution: +184-57313725 The phone number of the girl's educational institution: +184-53716900 |

6. Time, date, place and circumstances of the wrongful retention, based on the claims of the left-behind parent:

According to the mother, the parents agreed orally that the father could take the children for a two-week visit, to his family in the United States, during the Passover holiday in April 2023, provided that the children return in time to start school after the break, that being by 18 April 2023.

The mother claims that the father was hospitalized in the United States from 14-21 April, 2023. The mother therefore asked that the children be returned without him, however the father refused. She again requested their return after he was discharged, however he continued to refuse. She states that on 9 May, 2023, she demanded the return of the children and stated that she would take legal action if he did not comply. The father then cut off all contact with her, and between her and the children.

7. Factual and legal background justifying this request, based on the claims of the left-behind parent:

7.1 Habitual Residence is Israel:

According to the mother, the children were born in the United States. The family immigrated to Israel in 2019, and since then have lived in Israel, where the children have been attending Israeli educational institutions and are registered in the Israeli health system.

7.2 The requesting party has Custodial Rights under Israeli Law:

Pursuant to Israel's Capacity and Guardianship Law 1962, parents are the joint guardians of their minor children, which includes the right to custody and the right to determine the children's place of residence. The mother, therefore, has custodial rights under Israeli law.

7.3 The Requesting Party exercised their Custodial Rights Prior to The Wrongful removal :

The mother states that she has been actively involved in the children's upbringing and their daily care since their birth. She has been involved in all aspects of their lives, including medical appointments, daycare, etc.

The mother therefore claims that the retention of the children in the United States, without her consent, is in contravention of her custodial rights that she was exercising at the time, and therefore constitutes a wrongful retention within the meaning of Article 3 of the Convention.

8. Civil proceedings in progress between the parties:

To the mother's knowledge there are no such proceedings.

9. Voluntary Return or Mediation:

The mother wishes to pursue voluntary return.

10. The child/ren is to be returned to:

| | |
|------------------------|-----------------|
| First and last name(s) | Perl Felberbaum |
|------------------------|-----------------|

| | |
|---|---|
| Relationship to the child/ren | Mother |
| Address | Ezra 39, Bnei Brak, Israel |
| Telephone number | +972-58-3279438 |
| Proposed arrangements for the return of the child/ren | Should the court in the United States order the return of the children to Israel and should the father refuse to return with them, the mother states that she will make the necessary arraignments to have the children returned to Israel. |

11. List of Documents Attached with translations:

- a. Birth Certificates of the children.
- b. Parents' marriage certificate.
- c. Confirmation of the son's attendance in Israeli educational institutions. (The mother has not yet been able to obtain confirmation from the daughter's school).
- d. Confirmation of the children's membership with healthcare services in Israel
- e. Extracts from the Population Registry in Israel, confirming that the children have been living in Israel since 2019.
- f. Photographs of the children.
- g. Copy of sections 14 and 15 of Israel's Capacity and Guardianship Law 1962 with respect to custodial rights.
- h. Authorization pursuant to Article 28 of the Hague Convention signed by applicant.
- i. Voluntary return letter signed by the applicant.
- j. Authorization to release case information, signed by the applicant.

Signature:

Efrat Greenboim

**Efrat Greenboim, Director
Department of International Affairs
Office of the State Attorney
On behalf of the
Central Authority for the
State of Israel**

Date: November 15, 2023